

1 **Matthew S. Vesterdahl, Esq.**
2 **Nevada Bar No. 15469**
3 **WOLFE & WYMAN LLP**
4 **6757 Spencer Street**
5 **Las Vegas, NV 89119**
6 *msvesterdahl@ww.law*
7 **Telephone: (702) 476-0100**
8 **Facsimile: (702) 476-0101**

9 **Attorneys for Defendant**
10 **NEWREZ, LLC, a Delaware Limited Liability Company, d/b/a SHELLPOINT**
11 **MORTGAGE SERVICING**

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 TRP FUND VIII, LLC, a Nevada Limited
15 Liability Company,

16 Plaintiff,

17 v.

18 NEWREZ, LLC, a Delaware Limited Liability
19 Company, d/b/a SHELLPOINT MORTGAGE
20 SERVICING,

21 Defendant.

Case No. 2:20-cv-01001-APG-BNW

**STIPULATION TO EXTEND DEADLINE
FOR DEFENDANT TO FILE RESPONSE
TO PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

22 Plaintiff, TRP FUND VIII, LLC, a Nevada Limited Liability Company ("Plaintiff"), and
23 Defendant, NEWREZ, LLC, a Delaware Limited Liability Company, d/b/a SHELLPOINT
24 MORTGAGE SERVICING ("Defendant"), by and through their respective counsels of record,
25 hereby agree and stipulate as follows:

26 IT IS HEREBY AGREED AND STIPULATED, that the deadline for Defendant to file a
27 responsive pleading to Plaintiff's Complaint shall be extended until June 25, 2020.

28 Good cause exists to grant the brief extension of the response deadline because the argument
Plaintiff makes is one that has been made by several other similarly situated property owners in
recent months and one that it is being currently litigated by Fannie Mae, Freddie Mac, FHFA, and
their servicers, including Defendant, in several other cases. Because this loan is owned by Fannie

1 Mae, briefing the issues in each of these cases, including this case, requires coordination amongst
2 Defendant's counsel, counsel for Fannie, and counsel for FHFA, and this coordination is taking extra
3 time especially with the continuing limitations imposed by COVID-19.

4 The parties have entered into the agreement in good faith and not for any improper purpose
5 or delay. This is the parties' first request for an extension.

6 **IT IS SO STIPULATED.**

7 DATED: June 10, 2020

DATED: June 10, 2020

8 WOLFE & WYMAN LLP

THE WRIGHT LAW GROUP, P.C.

9
10 By: /s/ Matthew S. Vesterdahl, Esq.

By: /s/ John Henry Wright, Esq.

11 MATTHEW S. VESTERDAHL, ESQ.
12 Nevada State Bar No. 15469
6757 Spencer Street
13 Las Vegas, NV 89119
Attorneys for Defendant
14 **NEWREZ, LLC, a Delaware Limited**
Liability Company, d/b/a SHELLPOINT
15 **MORTGAGE SERVICING**

JOHN HENRY WRIGHT, ESQ.
Nevada State Bar No. 6182
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Attorney for Plaintiff
TRP FUND VIII, LLC, a Nevada Limited
Liability Company

16
17
18 IT IS SO ORDERED

19 DATED: 11:56 am, June 11, 2020

20
21 

22 _____
23 BRENDA WEKSLER
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
28